

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

IN RE:)	BANKRUPTCY CASE NO.: 18-15027
)	
KARA CONSTANT)	CHAPTER 13 PROCEEDING
)	
DEBTOR(S))	JUDGE: JESSICA E. PRICE SMITH
)	
)	<u>MOTION TO PAY DEBTOR'S</u>
)	<u>CHAPTER 13 PLAN ARREARAGE</u>
)	<u>THROUGH THE PLAN</u>

Now comes the Debtor, Kara Constant, by and through counsel, to hereby respectfully request that this Honorable Court grant this Motion to Pay Debtor's Chapter 13 Plan Arrearage in the amount of \$2,917.20 through her Plan. For cause, Debtor states that he fell behind in her Chapter 13 payments when she changed departments at her current employer and the wage order indicator ceased. Debtor has provided all of the new information including her present job at University Hospitals Monte Ahuja Medical Center and a new Wage Order Indicator was uploaded on 9/1/20. The new Order was issued on 9/3/20 and Debtor has been working diligently with Counsel to have her employer begin honoring said Order. Debtor understands that she must make payments herself until the wage order is in effect.

WHEREFORE, based on the foregoing and in light of the fact this case was filed in good faith and for a proper purpose, Debtor prays this Motion is granted.

Respectfully submitted,

J.P. AMOURGIS & ASSOCIATES

/s/ Y. Eric Holtz
Y. Eric Holtz (0084326)
Attorney for Debtor(s)
3200 West Market Street, Ste. 106
Akron, Ohio 44333-3324
Phone: (330) 535-6650
Fax: (330) 535-2205
bk_department@amourgis.com

CERTIFICATE OF SERVICE

I certify that on September 24, 2020 a true and correct copy of the foregoing was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

- Lauren A Helbling served electronically
- United States Trustee served electronically

And by regular U.S. mail, postage prepaid, on:

The attached list of creditors.

/s/ Y. Eric Holtz
Y. Eric Holtz (0084326)

Central Research, Inc.
P.O. Box 1460
Lowell, AR 72745

Credit Collections Services
Attention: Bankruptcy
725 Canton Street
Norwood, MA 02062

LJ Ross
PO Box 6099
Jackson, MI 49204

National Payment Center
U.S. Department of Education
P.O. Box 105028
Atlanta, GA 30348

Ohio Department of Taxation
Bankruptcy Division
P.O. Box 530
Columbus, OH 43216

Powers, Friedman, Linn
22530 Sandlewood Road
Bedford, OH 44146

Santander Consumer USA
Po Box 961245
Ft Worth, TX 76161

Shaker Heights Public Library
Attn: Circulation Manager
16500 Van Aken Blvd
Cleveland, OH 44120

Southwest Credit Systems
4120 International Parkway
Suite 1100
Carrollton, TX 75007

U.S. Department of Education
Ecmc/Bankruptcy
Po Box 16408
Saint Paul, MN 55116

Unique National Collections
119 E. Maple Street
Jeffersonville, IN 47130

Zaremba Management Co.
681 Turney Road
Bedford, OH 44146